

Internal Revenue Service

Department of the Treasury

District
Director

Person to Contact

Telephone Number:

Refer Reply to:

Date

APR 27 1984

Dear Applicant:

We have considered your application for exemption from Federal income tax as an organization described in section 501(c)(6) of the Internal Revenue Code of 1954.

The information submitted disclosed that you were incorporated under the nonprofit corporation laws of the State of [REDACTED] in [REDACTED].

The purpose of the organization is to promote its members' businesses by exchanging business leads among members.

Section 1.501(c)(6)-1 of Income Tax Regulation states, in part, as follows:

"A business league is an association of persons having some common business interest, the purpose of which is to promote such common interest... It is an organization of the same general class as a chamber of commerce or board of trade. Thus, its activities should be directed to the improvement of business conditions of one or more lines of business as distinguished from the performance of particular service for individual persons."

Rev. Rul. 59-391, 1955-2 C.B., 191, provides that organizations formed to exchange business information among members do not qualify for exemption under section 501(c)(6) of the Code, because such activities constitute provision of services to individual members.

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We have concluded that you do not qualify for exemption from Federal income tax as an organization described in section 501(c)(6) of the Internal Revenue Code and you have agreed to this determination by signing Form 6018 on [REDACTED]. Accordingly, you are required to file income tax returns on Form 1120, annually, with your District Director.

Sincerely yours,

District Director

Enclosures:

Publication 89,
Form 6018